

# MINOR SOURCE OPERATING PERMIT

## OFFICE OF AIR QUALITY

**Syndicate Sales, Inc.**  
**2025 N. Wabash Street**  
**Kokomo, Indiana 46901**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 067-15877-00026	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 18, 2002  Expiration Date November 18, 2007

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary flower vases and steelpix manufacturing operation.

Authorized Individual: President  
Source Address: 2025 N. Wabash Street, Kokomo, IN 46901  
Mailing Address: P.O. Box 756, Kokomo, IN 46903-0756  
General Source Phone: (765) 457-7277  
SIC Code: 3085, 3613  
County Location: Howard  
Source Location Status: Attainment for all criteria pollutants  
Minor Source Operating Permit  
Minor Source, under PSD Rules.

### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) one (1) metal stamping press line, constructed in 1982, consisting of:
  - (1) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
  - (2) one (1) packaging operation.
- (b) one (1) stemming machine production line, constructed in 1982, including machining operations and a paint spray booth.
- (c) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Modification to Permit [326 IAC 2]**

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6 Minor Source Operating Permit [326 IAC 2-6.1]**

The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

### **B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an “authorized individual” as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change [326 IAC 2-6.1-6(d)].

**B.10 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

**B.12 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

### C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.



## Testing Requirements

### C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.6 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

## Compliance Monitoring Requirements

### C.7 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.8 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### C.9 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

## **Record Keeping and Reporting Requirements**

### **C.10 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### **C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

### **C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- (a) one (1) metal stamping press line consisting of:
- (1) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
  - (2) one (1) packaging operation.
- (b) one (1) stemming machine production line, including machining operations and a paint spray booth.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-4] [326 IAC 8-2-9]

- (a) Any change or modification which may increase the potential volatile organic compound emissions to 25 tons per year or more from the metal stamping press line must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-2-4 (Coil Coating Operations) and 326 IAC 8-2-9 (miscellaneous metal coating operations).
- (b) Any change or modification which may increase the potential volatile organic compound emissions to 25 tons per year or more from the stemming machine production line must be approved by the Office of Air Quality (OAQ) and be subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

#### D.1.2 Particulate-Matter (PM) [40 CFR 52 Subpart P]

Pursuant to [40 CFR 52 Subpart P], the PM from the stemming machine production line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) Particulate from the surface coating processes at the stemming machine production line shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### **Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

##### **D.1.3 Testing Requirements [326 IAC 2-1.1-11]**

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

##### **D.1.4 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

##### **D.1.5 VOC Emissions**

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each quarter based on the total volatile organic compound usage for the most recent twelve (12) month period.

##### **D.1.6 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Syndicate Sales, Inc.</b>
<b>Address:</b>	<b>2025 N. Wabash Street, Kokomo, IN 46901</b>
<b>City:</b>	<b>Kokomo</b>
<b>Phone #:</b>	<b>(765) 457-7277</b>
<b>MSOP #:</b>	<b>067-15877-00026</b>

I hereby certify that **[source]** is ☒ still in operation.  
☐ no longer in operation.

I hereby certify that **[source]** is ☒ in compliance with the requirements of MSOP **067-15877-00026**.  
☐ not in compliance with the requirements of MSOP **067-15877-00026**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>





**Please note - This form should only be used to report malfunctions  
applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP)

<b>Source Name:</b>	Syndicate Sales, Inc.
<b>Source Location:</b>	2025 N. Wabash Street, Kokomo, Indiana 46901
<b>SIC Code:</b>	3085, 3613
<b>County:</b>	Howard
<b>Operation Permit No.:</b>	M067-15877-00026
<b>Permit Reviewer:</b>	Seema Roy /EVP

On September 23, 2002, the Office of Air Quality (OAQ) had a notice published in the Howard County Public Library, Kokomo, Indiana, stating that Syndicate Sales, Inc. had applied for a Minor Source Operating Permit (MSOP) for a flower vases and steelpix manufacturing operation. The notice also stated that OAQ proposed to issue a Minor Source Operating Permit for this operation and provided information on how the public could review the proposed MSOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this MSOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the MSOP. Bolded language has been added and the language with a line through it has been deleted.

1. The electronic letterhead has being removed from the model document.
2. Section A.1  
The title of the authorized individual is now preferred so that there are less changes needed to be made. A general number has replace the contact person's phone number. "County Status" has been replaced with "Source Location Status" in order to clarify when only portions of a county are non-attainment.

#### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary flower vases and steelpix manufacturing operation.

Authorized Individual:	<del>David M. Hendrickson</del> <b>President</b>
Source Address:	2025 N. Wabash Street, Kokomo, IN 46901
Mailing Address:	P.O. Box 756, Kokomo, IN 46903-0756
<b>General Source</b> Phone:	(765) 457-7277
SIC Code:	3085, 3613
County Location:	Howard
<del>County Status:</del>	<del>Attainment for all criteria pollutants</del>
Source <b>Location</b> Status:	Attainment for all criteria pollutants Minor Source Operating Permit Minor Source, under PSD Rules.

3. A.2 (Emissions Units and Pollution Control Equipment Summary) the dates of construction have been added to the emission unit description.

#### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) one (1) metal stamping press line, **constructed in 1982**, consisting of:
    - (1) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
    - (2) one (1) packaging operation.
  - (b) one (1) stemming machine production line, **constructed in 1982**, including machining operations and a paint spray booth.
4. Part (b) of B.7 (Minor Source Operating Permit) has been incorporated into B.5.

**B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

**The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.**

**B.6 Minor Source Operating Permit [326 IAC 2-6.1]**

~~(a)~~ The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

~~(b) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.~~

5. Annual Notification has been moved to Section B.7 from Section C.16.
6. Preventive Maintenance Plan has been moved to Section B.8 from Section C.2. The language "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In (c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAQ requests it.

**~~C.2~~B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) **within ninety (90) days** after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

**If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:**

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

- (b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that failure to implement the ~~Preventive Maintenance Plan~~ **a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
  - (c) **A copy of the** PMPs shall be submitted to IDEM, OAQ upon request **and within a reasonable time**, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its ~~Preventive Maintenance Plan~~ **PMPs** whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
  - (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
7. Permit Revision has been moved to Section B.9 from Section C.3. (a) has been revised to prevent liability to both a permit violation and a rule violation. By changing this language IDEM is merely referencing the requirements and not mandating compliance with it. It has been changed to replace "should" with "shall" in subpart (b). "the" authorized individual has been replaced with "an" authorized individual, because the rule does not specify that it has to be one individual; this change will be made throughout the permit.

**~~C.3~~B.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

- (a) ~~The Permittee must comply with~~ **Permit revisions are governed by** the requirements of 326 IAC 2-6.1-6 ~~whenever the Permittee seeks to amend or modify this permit.~~
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1.

8. Inspection and Entry and Transfer of Ownership have both been moved to Sections B.10 and B.11, respectively, from Sections C.4 and C.5, respectively.
9. B.12 Annual Fee Payment was added to the permit.

**B.12 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
  - (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.
10. C.6 Permit Revocation has been re-numbered as C.2 and the rule cite was corrected.

**C.62 Permit Revocation [~~326 IAC 2-1-9~~] [326 IAC 2-1.1-9]**

11. Asbestos Abatement Projects has been added to the MSOP.

**C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

**All required notifications shall be submitted to:**

**Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.**

- (e) Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

12. C.8 (Performance Testing) has been re-numbered as C.5 and rearranged for clarity. Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the authorized individual. Part (c) “within” has been changed to “not later than”.

**C.85 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

~~no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.**

- ~~(b)(c)~~ Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ within not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within not later than five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

13. C.6 Compliance Requirements is a new condition that refers to IDEM's general compliance authority in 326 IAC 2-1.1-11.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.6 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

14. C.9. Compliance Monitoring has been re-numbered as C.7

##### **C.97. Compliance Monitoring [326 IAC 2-1.1-11]**

15. C.10 Monitoring Methods has been re-numbered as C.8 and the following rule cites have been added.

##### **C.408 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

16. C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6] has been re-numbered as C.9 and updated to the current model language.

##### **C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]**

- ~~(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:~~

- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section G (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- ~~(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~

- ~~\_\_\_\_\_ (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
- ~~\_\_\_\_\_ (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- ~~\_\_\_\_\_ (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- ~~\_\_\_\_\_ (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
  - ~~\_\_\_\_\_ (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
  - ~~\_\_\_\_\_ (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;~~
  - ~~\_\_\_\_\_ (3) An automatic measurement was taken when the process was not operating; or~~
  - ~~\_\_\_\_\_ (4) The process has already returned to operating within "normal" parameters and no response steps are required.~~
- ~~\_\_\_\_\_ (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~

#### **C.9 Compliance Response Plan - Preparation and Implementation**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:**
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.**
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:**



- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

17. C.12 Malfunctions Report has been re-numbered as C.10.

C.120 Malfunctions Report [326 IAC 1-6-2]

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18. C.13 Monitoring Data Availability has been incorporated into C.9 Compliance Response Plan - Preparation and Implementation

~~C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

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- ~~(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

- ~~\_\_\_\_\_ (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~
  - ~~\_\_\_\_\_ (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~
  - ~~\_\_\_\_\_ (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
  - ~~\_\_\_\_\_ (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~
  - ~~\_\_\_\_\_ (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~
19. (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that they get a "reasonable time" to produce records no matter how or when IDEM ask for them. "monitoring" was removed so that the condition will seem more generalized to all record keeping, "reports" was added to clarify that the source must keep copies of those as well. (b) and (c) have been removed because they were unnecessary.

**C.141 General Record Keeping Requirements [326 IAC 2-6.1-2 5]**

- (a) Records of all required ~~monitoring data~~, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAQ representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- ~~(b) Records of required monitoring information shall include, where applicable:~~
  - ~~\_\_\_\_\_ (1) The date, place, and time of sampling or measurements;~~
  - ~~\_\_\_\_\_ (2) The dates analyses were performed;~~
  - ~~\_\_\_\_\_ (3) The company or entity performing the analyses;~~
  - ~~\_\_\_\_\_ (4) The analytic techniques or methods used;~~
  - ~~\_\_\_\_\_ (5) The results of such analyses; and~~
  - ~~\_\_\_\_\_ (6) The operating conditions existing at the time of sampling or measurement.~~
- (c) Support information shall include, where applicable:
  - \_\_\_\_\_ (1) Copies of all reports required by this permit;
  - \_\_\_\_\_ (2) All original strip chart recordings for continuous monitoring instrumentation;
  - \_\_\_\_\_ (3) All calibration and maintenance records;

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~**(b) Unless otherwise specified in this permit, a** All record keeping requirements not already legally required shall be implemented when operation begins.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Minor Source Operating Permit**

#### **Source Background and Description**

**Source Name:** Syndicate Sales, Inc.  
**Source Location:** 2025 N. Wabash Street, Kokomo, IN 46901  
**County:** Howard  
**SIC Code:** 3085, 3613  
**Operation Permit No.:** 067-15877-00026  
**Permit Reviewer:** Seema Roy/EVP

The Office of Air Quality (OAQ) has reviewed an application from Syndicate Sales, Inc. relating to the operation of a stationary flower vases and steelpix manufacturing source.

#### **Source History**

Syndicate Sales, Inc. was issued a FESOP (F067-7699-00026) on January 29, 1998 and submitted a permit renewal application to IDEM, OAQ on April 18, 2002. Syndicate Sales, Inc. indicated that the source has removed some of the equipment listed in the FESOP since the issuance of the FESOP. Based on the calculations conducted by IDEM, the source wide potential emissions for the remaining equipment are at MSOP levels. Syndicate Sales, Inc. requested that the application be reviewed as an MSOP.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) one (1) metal stamping press line consisting of:
  - (1) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
  - (2) one (1) packaging operation.

The method of application for coatings is dipping.
- (b) one (1) stemming machine production line, including machining operations and a paint spray booth.
- (c) natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

### Permitted Emission Units and Pollution Control Equipment Removed from the Source

Following permitted emission units and pollution control devices have been removed from the source:

- (a) one (1) flow coating line consisting of:
  - (1) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
  - (2) one (1) UV exposure room;
  - (3) two (2) vacuum metallizers;
  - (4) one (1) aqueous dye dip tank;
  - (5) two (2) rinse tanks; and
  - (6) one (1) electric drying oven.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP (F067-7699-00026) issued on January 29, 1998.

Only those conditions from the previous permit which are related to the equipment still remaining at the source were incorporated into this MSOP.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Spray Booth Stack	Surface Coating	24.67	1.67	4500	Ambient

### Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on April 18, 2002.

There was no notice of completeness letter mailed to the source.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 to 5).

## Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	14.05 (less than 25)
PM-10	14.15 (less than 25)
SO <sub>2</sub>	0.00 (less than 25)
VOC	26.08 (greater than 25 and less than 100)
CO	2.40 (less than 25)
NO <sub>x</sub>	2.80 (less than 25)

HAP's	Potential To Emit (tons/year)
Ethylene Glycol	0.86 (less than 10)
TOTAL	0.86 (less than 25)

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of CO, NO<sub>x</sub>, PM<sub>10</sub>, or SO<sub>2</sub> are less than 25 tons per year and VOC emissions are greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## County Attainment Status

The source is located in Howard County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Howard County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, Ozone, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## **Part 70 Permit Determination**

### **326 IAC 2-7 (Part 70 Permit Program)**

This existing source not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year;
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year; and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on the information provided by the source.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

## **State Rule Applicability - Entire Source**

### **326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

The metal stamping operation is not subject to this rule because the three metal stamping presses were constructed in 1982, prior to the rule applicability date and there are no Hazardous Air Pollutants (HAPs) emitted from the operation.

The spray booth at stemming machine production line is not subject to this rule because it was installed in 1982, prior to the rule applicability date and the potential emissions of any single HAP and any combination of HAPs are less than 10 tpy and 25 tpy respectively.

### **326 IAC 2-6 (Emission Reporting)**

This source is located in Howard County which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NO<sub>x</sub>, PM<sub>10</sub>, or SO<sub>2</sub> in amounts at or exceeding one-hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

### **326 IAC 5-1 (Opacity)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### State Rule Applicability - Individual Facilities

##### 326 IAC 6-3-2(d) (Particulate)

- (a) The metal stamping operation is not subject to this rule because there is no particulate emitted from the operation which uses a dipping method for coating.
- (b) Pursuant to [40 CFR 52 Subpart P] the particulate matter (PM) from the stemming machine production line shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (1) Particulate from the surface coating processes at the stemming machine production line shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

##### 326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8.

The metal stamping press line constructed in 1982, is not subject to the requirements of 326 IAC 8-1-6 since potential VOC emissions from metal stamping operation are less than 25 tons per year.

The spray booth at stemming machine production line, constructed in 1982, is not subject to the requirements of 326 IAC 8-1-6 since potential VOC emissions from this operation are less than 25 tons per year.



**326 IAC 8-2-4 (Coil Coating Operations)**

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) constructed in 1982 and located in Howard county, which is not one of the listed counties, are not subject to the provisions of 326 IAC 8-2-4 since the potential VOC emissions from the three (3) presses are less than 25 tons per year.

The spray booth at stemming machine production line, constructed in 1982, located in Howard county, is not subject to the requirements of 326 IAC 8-2-4 since potential VOC emissions from this operation are less than 25 tons per year.

**326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)**

The three (3) metal stamping presses (ID Nos. 2, 3, and 4), constructed in 1982, located in Howard County, which is not one of the listed counties, are not subject to the provisions of 326 IAC 8-2-9 since the potential VOC emissions from the three (3) presses are less than 25 tons per year.

The spray booth at stemming machine production line, constructed in 1982, located in Howard county, is not subject to the requirements of 326 IAC 8-2-9 since potential VOC emissions from this operation are less than 25 tons per year.

There are no other 326 IAC 8 rules that apply.

**Conclusion**

The operation of this flower vases and steelpix manufacturing facility operation shall be subject to the conditions of the attached proposed MSOP 067-15877-00026. This MSOP supersedes FESOP F067-7699-00026, issued on January 29, 1998.

## Appendix A: Emission Calculations

**Company Name:** Syndicate Sales, Inc.  
**Address, City, IN Zip:** 2025 N. Wabash Street, Kokomo, Indiana 46901  
**MSOP:** 067-15877-00026  
**Reviewer:** Seema Roy  
**Date:** June 18, 2002

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating Operations	Natural Gas Combustion	TOTAL
PM **	13.95	0.10	14.05
PM10	13.95	0.20	14.15
SO2	negl.	negl.	negl.
NOx	negl.	2.80	2.80
VOC	25.88	0.20	26.08
CO	negl.	2.40	2.40
total HAPs	0.86	negl.	0.86
worst case single HAP	0.86	negl.	0.86
Total emissions based on rated capacities at 8760 hours/year.			

Limited Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating Operations	Natural Gas Combustion	TOTAL
PM **	13.95	0.10	14.05
PM10	13.95	0.20	14.15
SO2	negl.	negl.	0.00
NOx	negl.	2.80	2.80
VOC***	25.88	0.20	26.08
CO	negl.	2.40	2.40
total HAPs	0.86	negl.	0.86
worst case single HAP	0.86	negl.	0.86
Total emissions based on rated capacities at 8760 hours/year.			

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion**  
**MM BTU/HR <100**

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**Company Name:** Syndicate Sales, Inc.  
**Address, City, IN Zip:** 2025 North Wabash Street, Kokomo, Indiana 46901  
**MSOP:** 067-15877-00026  
**Reviewer:** Seema Roy  
**Date:** July 23, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

6.4

56.2

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.2	0.0	2.8	0.2	2.4

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**HAPs Emissions**

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**Company Name:** Syndicate Sales, Inc.  
**Address, City, IN Zip:** 2025 North Wabash Street, Kokomo, Indiana 46901  
**MSOP:** 067-15877-00026  
**Reviewer:** Seema Roy  
**Date:** July 23, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.901E-05	3.372E-05	2.107E-03	5.058E-02	9.553E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.405E-05	3.091E-05	3.934E-05	1.068E-05	5.901E-05

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations  
VOC and Particulate  
Surface Coating Operations**

**Company Name:** Syndicate Sales, Inc.  
**Address, City, IN Zip:** 2025 North Wabash Street, Kokomo, Indiana 46901  
**MSOP:** 067-15877-00026  
**Reviewer:** Seema Roy  
**Date:** July 9, 2002

Potential Uncontrolled Emissions:																		
Material (as applied)	Process	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons/yr	lb VOC per gal solids	Transfer Efficiency	
Stamping Oil No. 7	Press 1	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1033	5.82	5.82	1.59	38.11	6.96	0.00	64.70	100.00%	
Stamping Oil No. 7	Press 2	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1168	5.82	5.82	1.80	43.09	7.86	0.00	64.70	100.00%	
Stamping Oil No. 7	Press 3	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1482	5.82	5.82	2.28	54.68	9.98	0.00	64.70	100.00%	
Paing RM 90-1	STLPX booth	8.4	3.74%	0.00%	3.74%	0.00%	41.30%	0.0063	125	0.31	0.31	0.25	5.94	1.08	13.95	0.76	50.00%	
Uncontrolled Potential Emissions:												5.91	141.82	25.88	13.95			
Potential Controlled Emissions:																		
Limited Potential Emissions:												Controlled VOC pounds per hour	Controlled VOC pounds per day	Controlled VOC tons per year	Controlled PM tons/yr			
												5.91	141.82	25.88	13.95			

**Note:**

Potential emissions from the three stamping presses are less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.

**Methodology:**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hrs/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = Maximum (units/hr) \* Gal of Material (gal/unit) \* Density (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer Eff.) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Transfer Efficiency

Limited VOC Tons per Year = Potential VOC Tons per Year

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

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**Company Name:** Syndicate Sales, Inc.  
**Address, City, IN Zip:** 2025 North Wabash Street, Kokomo, Indiana 46901  
**MSOP:** 067-15877-00026  
**Reviewer:** Seema Roy  
**Date:** September 4, 2002

Process	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylene Glycol	Ethylene Glycol (ton/yr)
STLPX Booth	Paing BM 90-1	8.4	0.00630	125.000	3.00%	0.86

Total Uncontrolled Potential to Emit **0.86**  
Total Limited Potential to Emit **0.86**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs